2017 FDA Workshop - Establishing a Baseline of Cybersecurity Hygiene
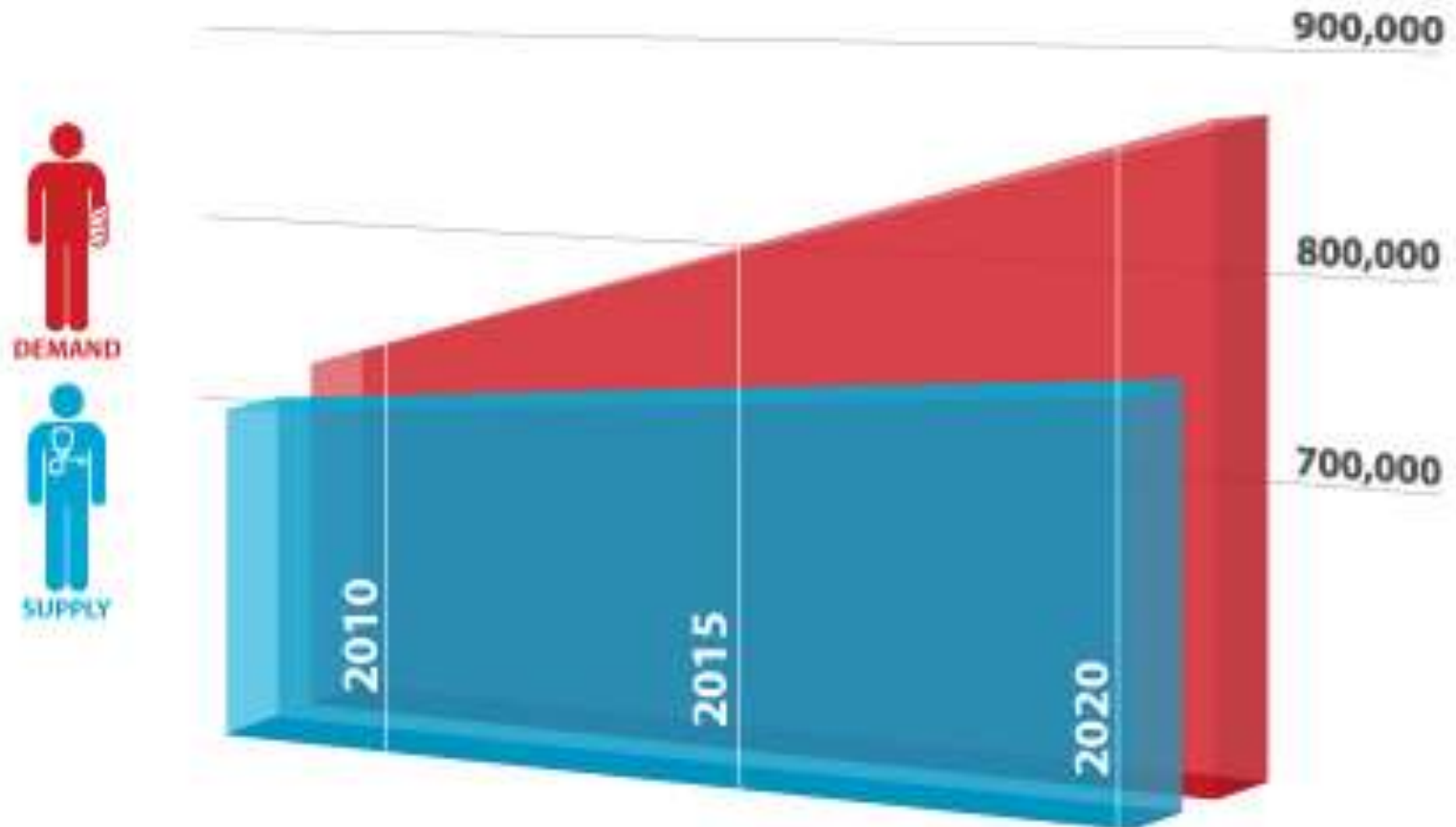
Anura Fernando – Principal Engineer - UL

Why are we really here today?
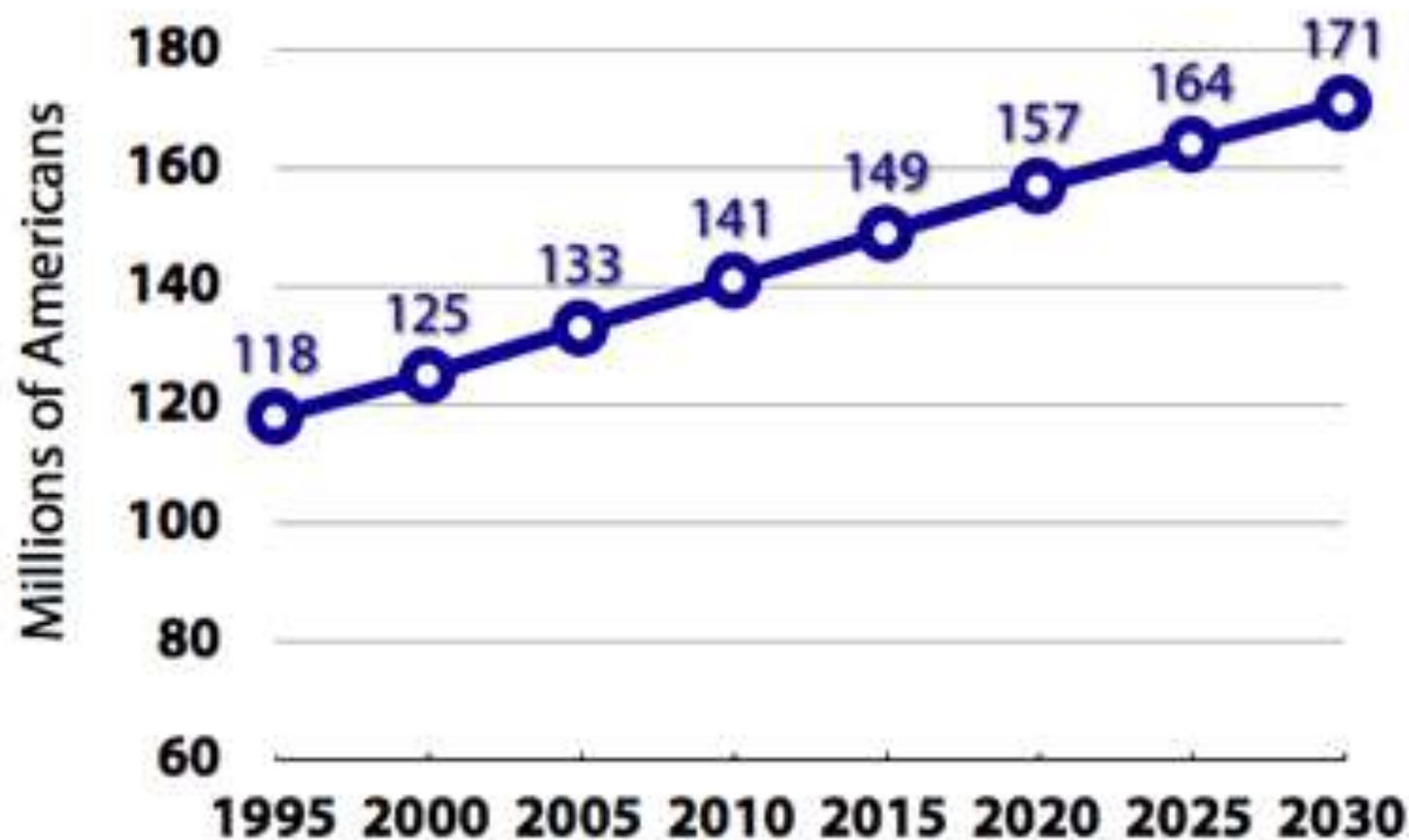
Projected Supply and Demand, Physicians, 2008-2020
(ALL SPECIALTIES)

900,000

800,000

DEMAND

SUPPLY

700,000

2010

2015

2020

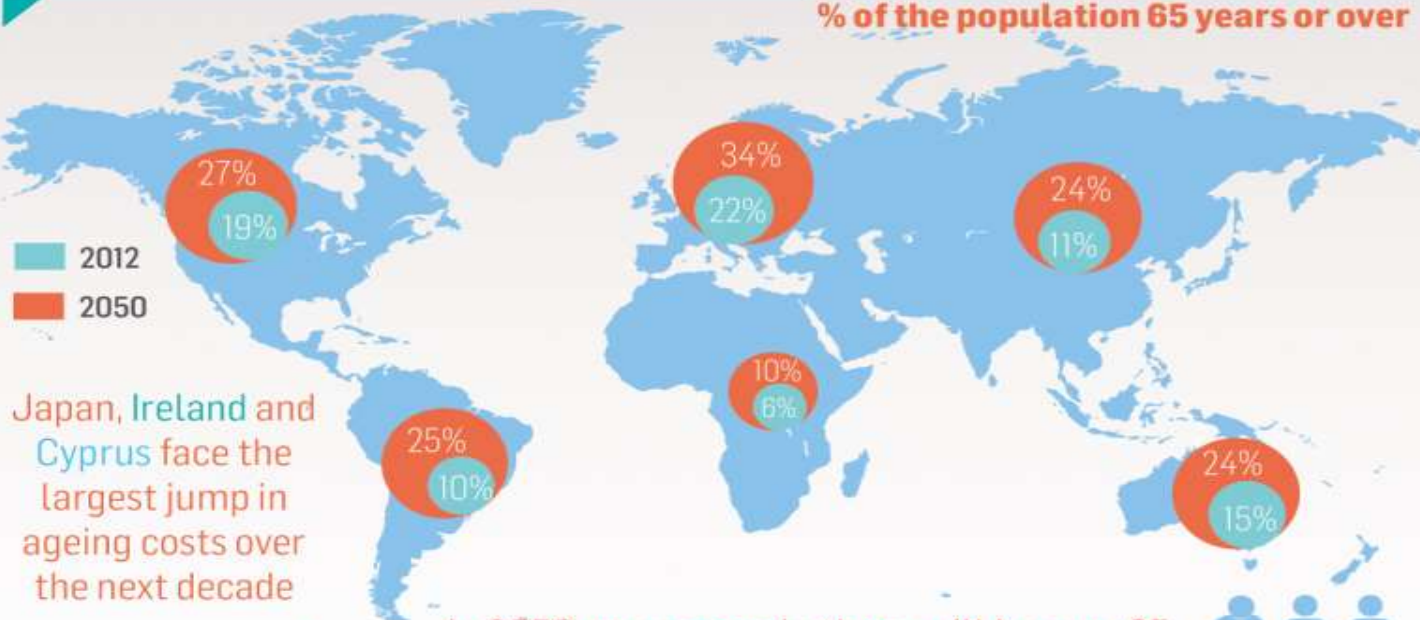https://www.aamc.org/advocacy/campaigns_and_coalitions/fixdocshortage/
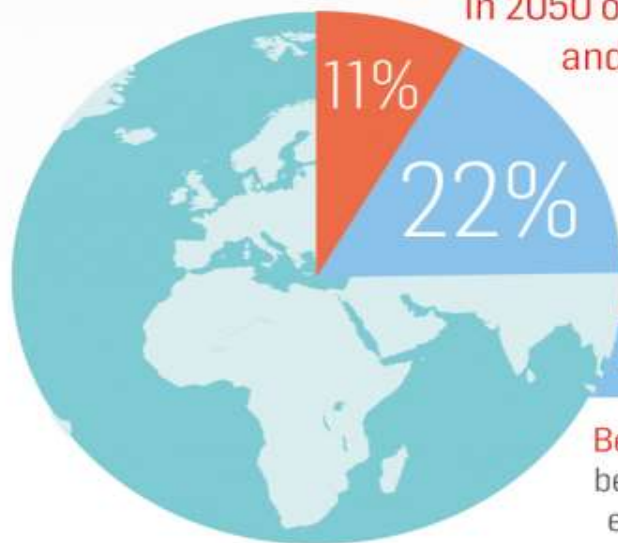
Prevalence of Chronic Disease in the U.S.

Source: Wu, Shin-Yi *et al*. 2000. Projection of Chronic Illness Prevalence and Cost Inflation. RAND Corporation.

THE WORLD'S AGEING POPULATION

% of the population 65 years or over

% of over 50's in overall population

- 2012
- 2050

North America: 27% / 19%
Europe: 34% / 22%
Asia: 24% / 11%
South America: 25% / 10%
Africa: 10% / 6%
Australia: 24% / 15%

Japan, Ireland and Cyprus face the largest jump in ageing costs over the next decade

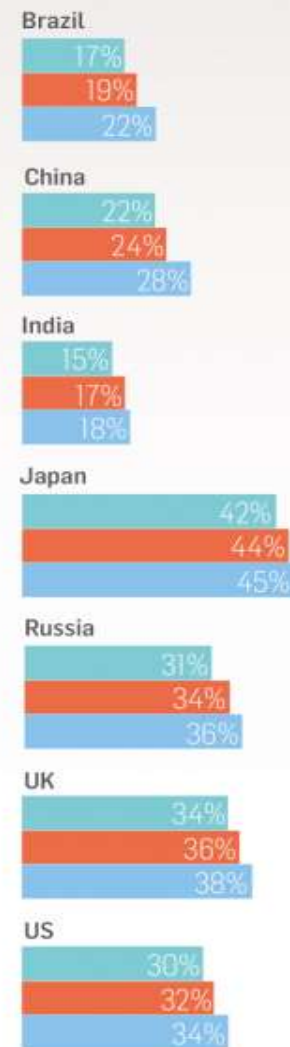In 2050 one person in three will be over 65 and one person in ten will be over 80

11% / 22%

2012 - 11% of the world's 6.9bn people are over 60

2050 - 22% of the world's 9bn people will be over 60

Between now and 2050 the fiscal burden of the crisis will be 10% of the ageing-related costs. The other 90% will be extra spending on pensions, health and long-term care

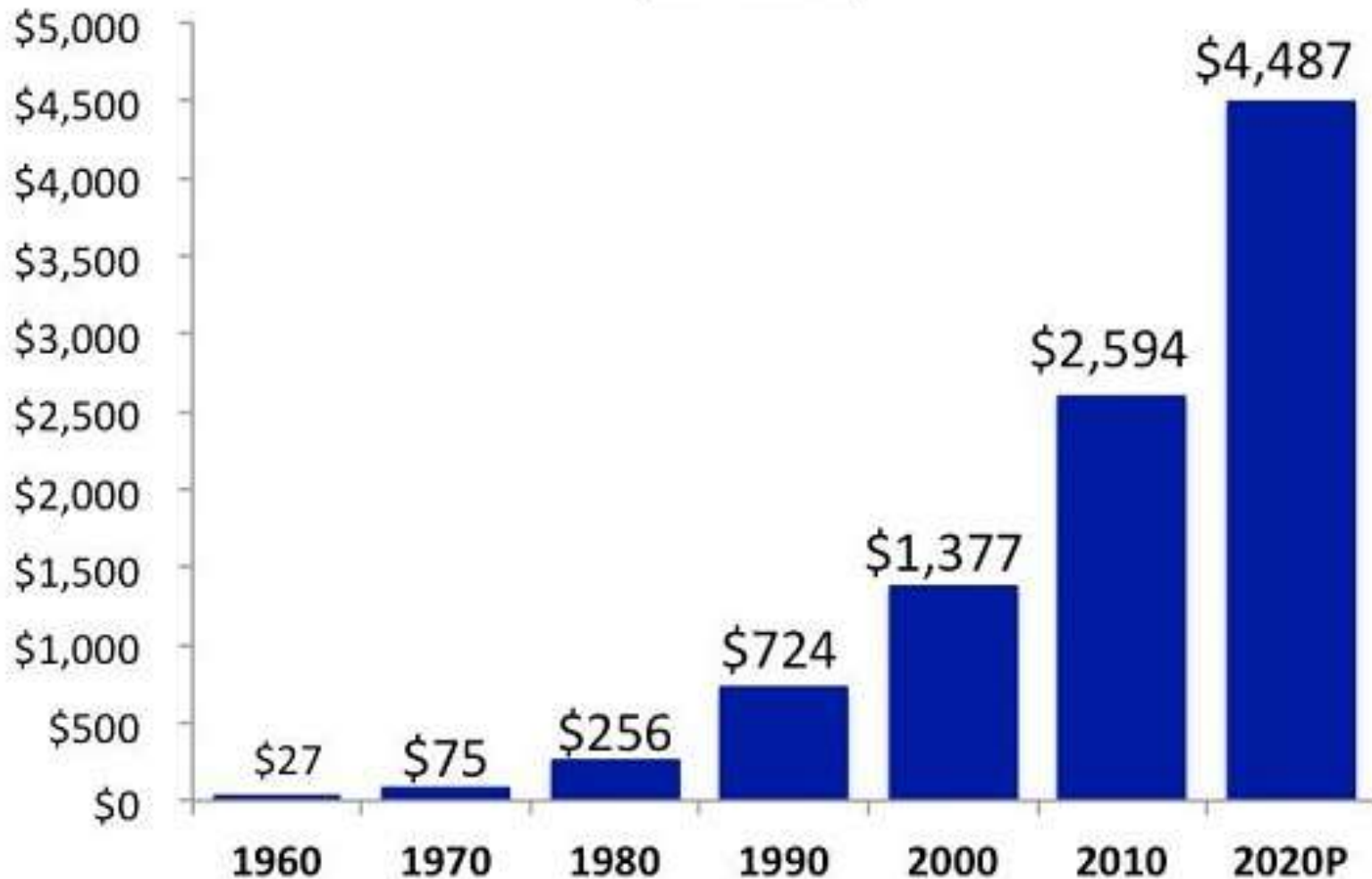|	2006	2011	2016
Brazil	17%	19%	22%
China	22%	24%	28%
India	15%	17%	18%
Japan	42%	44%	45%
Russia	31%	34%	36%
UK	34%	36%	38%
US	30%	32%	34%

5

Healthcare Costs 1960 – 2020

(In Billions)

Year	Cost
1960	$27
1970	$75
1980	$256
1990	$724
2000	$1,377
2010	$2,594
2020P	$4,487

How do we fix this problem?

One approach has been through the use of computing technologies

…that can be found everywhere

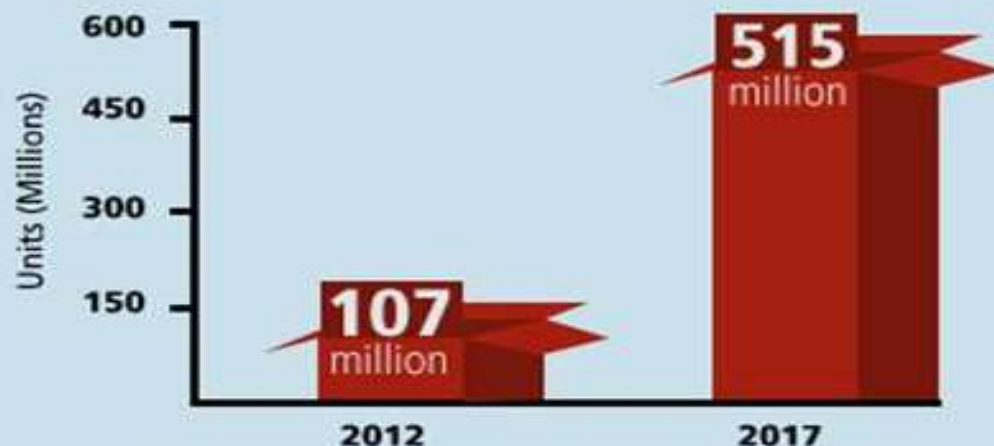http://2.bp.blogspot.com/-afr-gp6eyl

http://www.theverge.com/2013/4/26/4268982/idc-q1-2013-smartphone-market-data

http://www.untitledname.com/archives/upload/2005/10/bicyclist-cell-phone.jpg

http://thecoolgadgets.com/

Slide 9

Cheaper and better sensors make this viable

Trends & Quotes

Global Mobile Sensing Health & Fitness Shipments

515 million

107 million

2012   2017

Units (Millions): 600, 450, 300, 150

Source: ON World I as seen on mobihealthnews.com

"The whole sensor field is going to explode. It's a little all over the place right now, but with the arc of time it will become clearer."
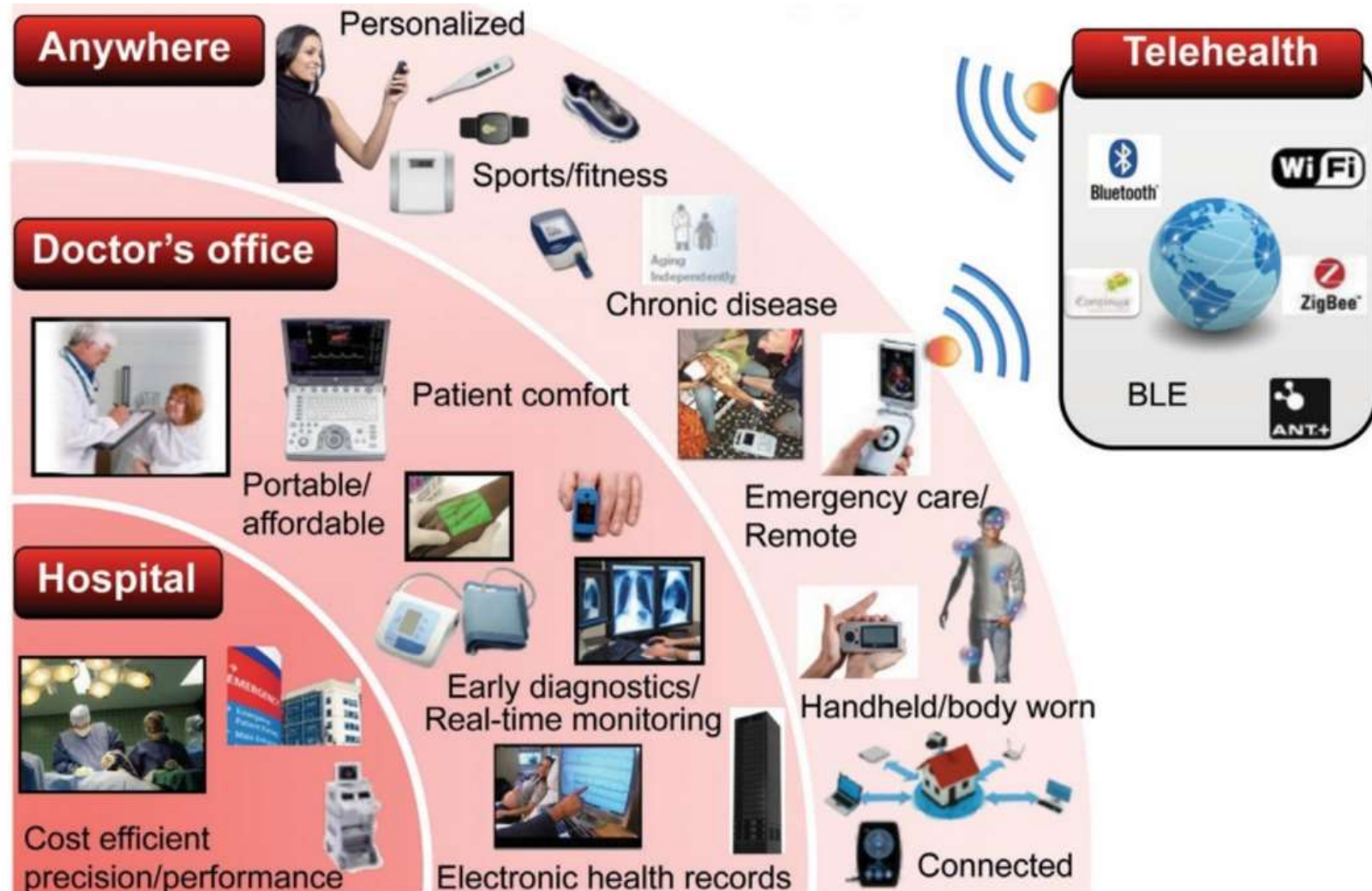-- Tim Cook, CEO, Apple, 2013
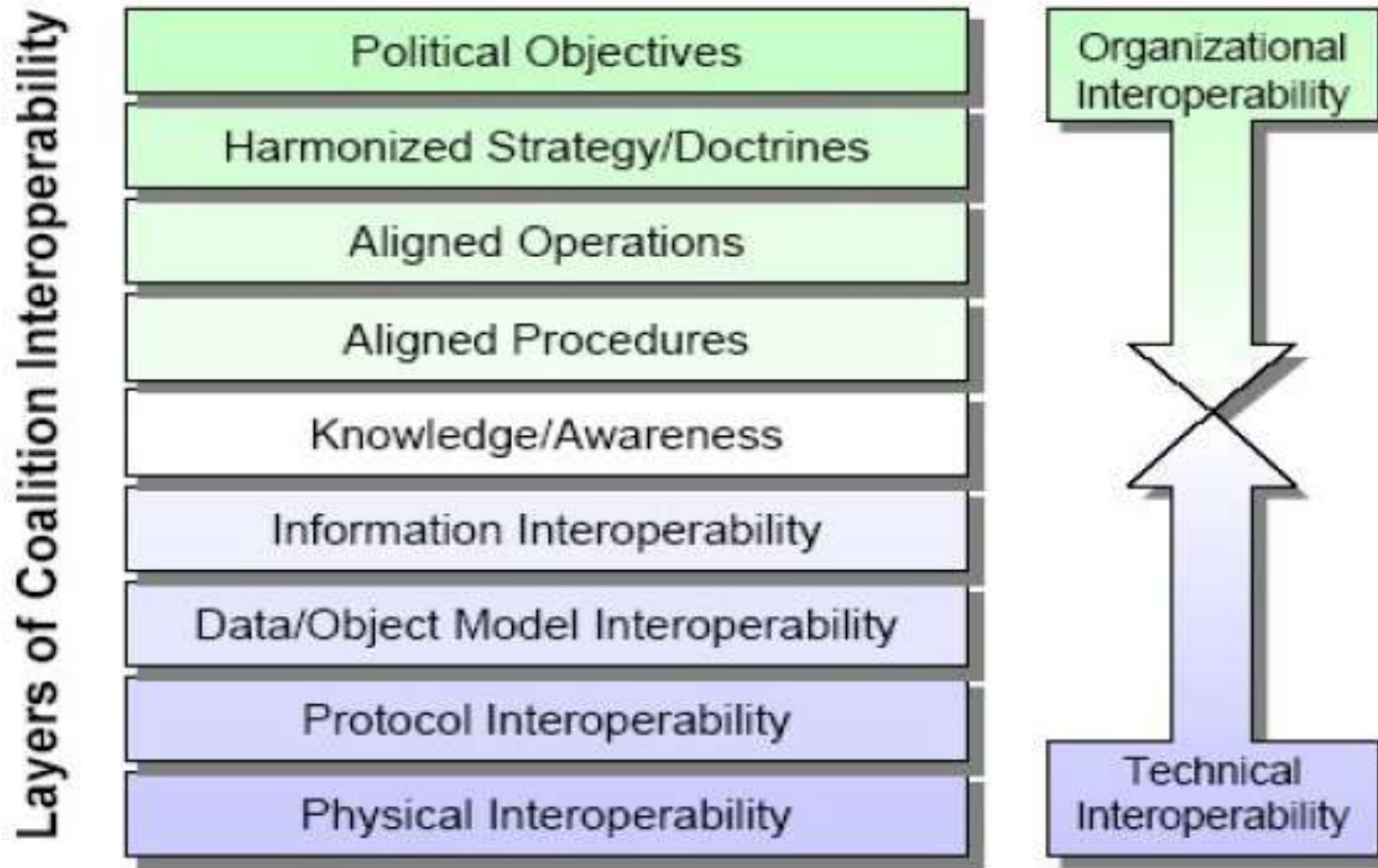
140 million
Americans live with chronic disease

"The next logical step in this evolution is for sensors to help manage chronic disease, which affect more than 140 million individuals in the United States, and account for more than 75% of our healthcare expenditures."
-- Eric Topol, The Creative Destruction of Medicine

Innovation leads to new ways to provide healthcare with limited clinician resources

Source: TI Medical

"Interoperability" is a key to success of this approach

[Tolk 03]   Tolk, Andreas. "Beyond Technical Interoperability – Introducing a Reference Model for Measures of Merit for Coalition Interoperability." 8th International Command and Control Research and Technology Symposium (ICCRTS), Washington, D.C., June 17-19, 2003. Washington DC: Command and Control Research Program (CCRP), 2003
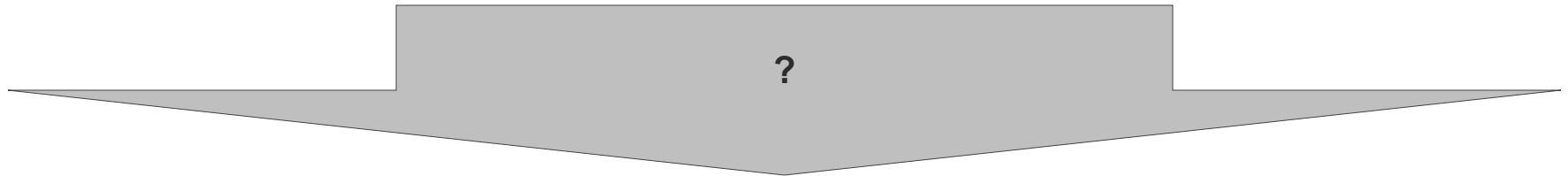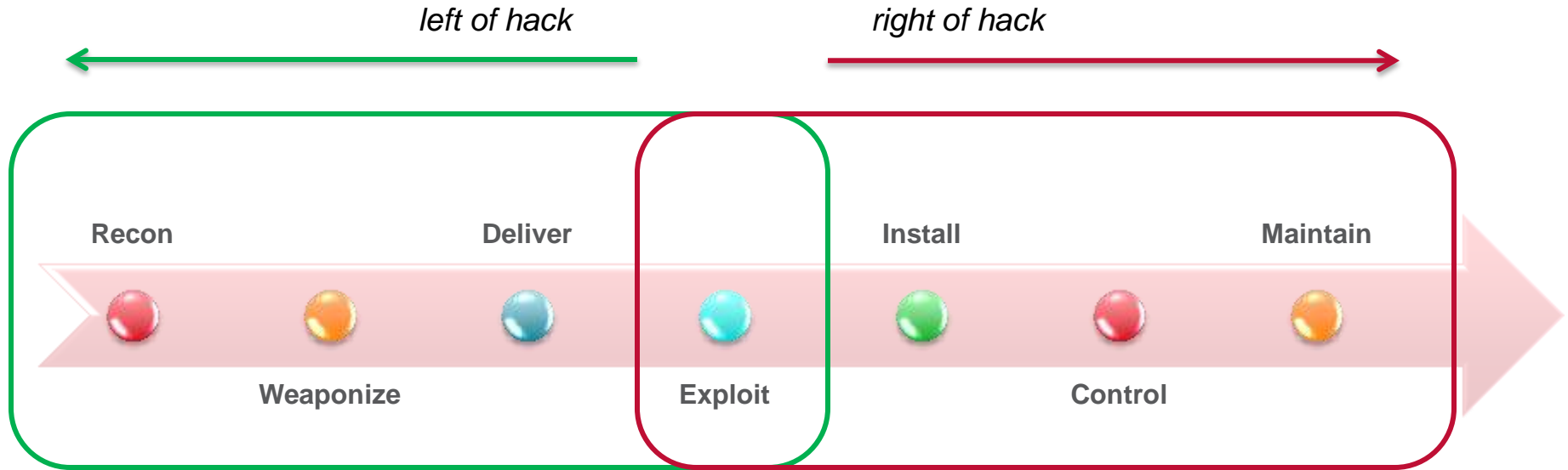
Problem solved !
So, why are we here again ???

New (mis)use cases that are reasonably foreseeable

How an attack works and potentially affects safety

left of hack

right of hack

Recon — Weaponize — Deliver — Exploit — Install — Control — Maintain

?

Potential Failure Mode	Potential Causes	Potential Effects	Existing Controls	SEV	OCC	RPN	Risk Control Measures	SEV	OCC	RPN	Record of Mitigation	Any New Risk / Hazard Created?	Risk Reduced As Far As Possible?

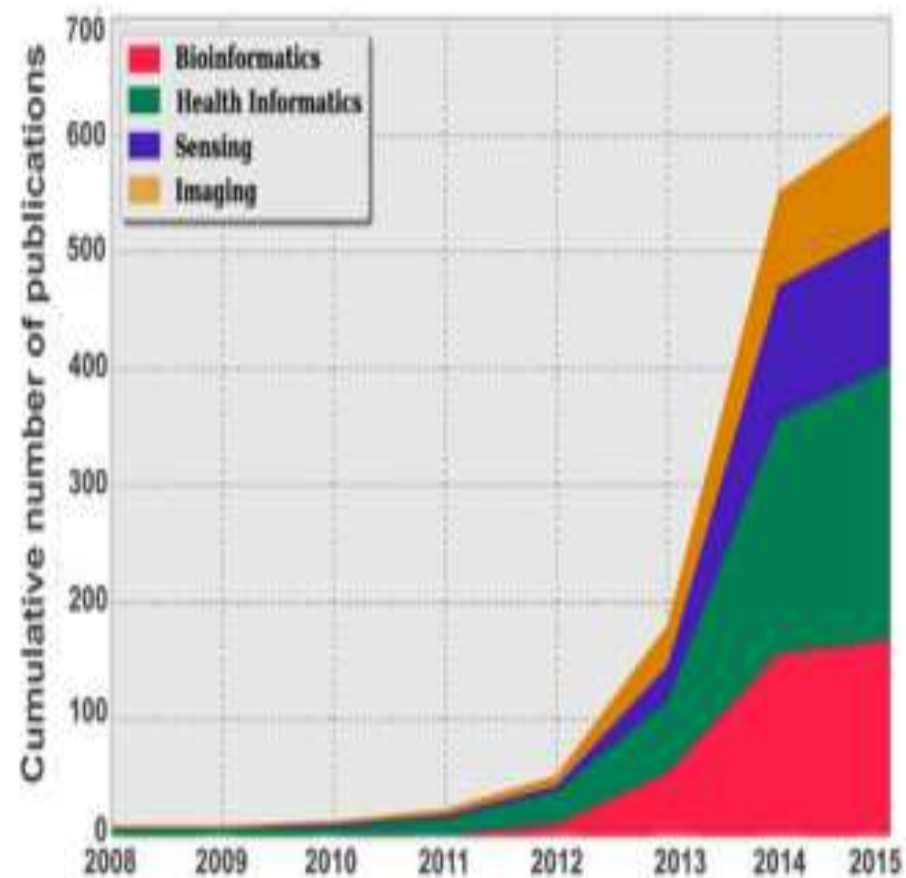# "Big data" trends create a richer pool of targets

Fig. 1. (a) Cumulative number of publications referring to "big data" indexed by Google Scholar. (b) Cumulative number of publications per health research area referring to "big data," as indexed in IEEE Xplore, ACM Digital library, PubMed (National Library of Medicine, Bethesda, MD), Web of Science, and Scopus.

Where do hackers find vulnerabilities to exploit?

[Tolk 03]   Tolk, Andreas. "Beyond Technical Interoperability – Introducing a Reference Model for Measures of Merit for Coalition Interoperability." 8th International Command and Control Research and Technology Symposium (ICCRTS), Washington, D.C., June 17-19, 2003. Washington DC: Command and Control Research Program (CCRP), 2003

The IoT Cyber Threat

70%

70% of IoT devices are vulnerable to attack *(Source:HP)*

66%

By 2018, 66% of networks will have experienced an IoT security breach *(Source: IDC Research)*

28% to 47%

28% to 47% of organizations have experienced IoT-related breaches *(Source: Forrester/CISCO)*

2014   2015   2016

3.5M   3.8M   4.0M

In 2016, the average consolidated total cost of a data breach was $4M USD *(Source: 2016 Ponemon Study)*

What's different about healthcare?

- Patient safety is the most important "asset"

- It is not an issue of just individual patients but also whole populations of patients

- Product risk profiles can be very diverse making risk factors difficult to normalize (e.g. some medical products intentionally expose people to radiation)

- Medical IoT and Telehealth are moving elements of the "practice of medicine" from the hospital into the home.

Where do we start when trying to tackle these problems?

Apply

NIST CyberSecurity Framework

IDENTIFY	PROTECT	DETECT	RESPOND	RECOVER
Asset Management	Access Control	Anomalies & Events	Response Planning	Recovery Planning
Business Environment	Awareness & Training	Security Continuous Monitoring	Communications	Improvements
Governance	Data Security	Detection Processes	Analysis	Communications
Risk Assessment	Info Protection Processes & Procedures		Mitigation	
Risk Management Strategy	Maintenance		Improvements	
	Protective Technology			

Source: XlentSoftware

**Analyze
the sociotechnical system**

PATIENT
SAFETY

Clinical
Scenarios

Interoperability
Scenarios

Connectable Devices

Connectivity Solutions:
Continua, IEEE, IHE, HL7, etc…

Enabling Technologies: Ethernet, WiFi,
Bluetooth, Zigbee, etc…

How might interoperability be exploited?

https://en.wikipedia.org/wiki/Conceptual_interoperability#/media/File:LCIM.png

Build security In

Security in the SDLC Process

Show evidence of security claims

Security-specific example of an assurance case (moderate threat)

Many standards and guidance documents are available to help meet different objectives

Guidance Documents

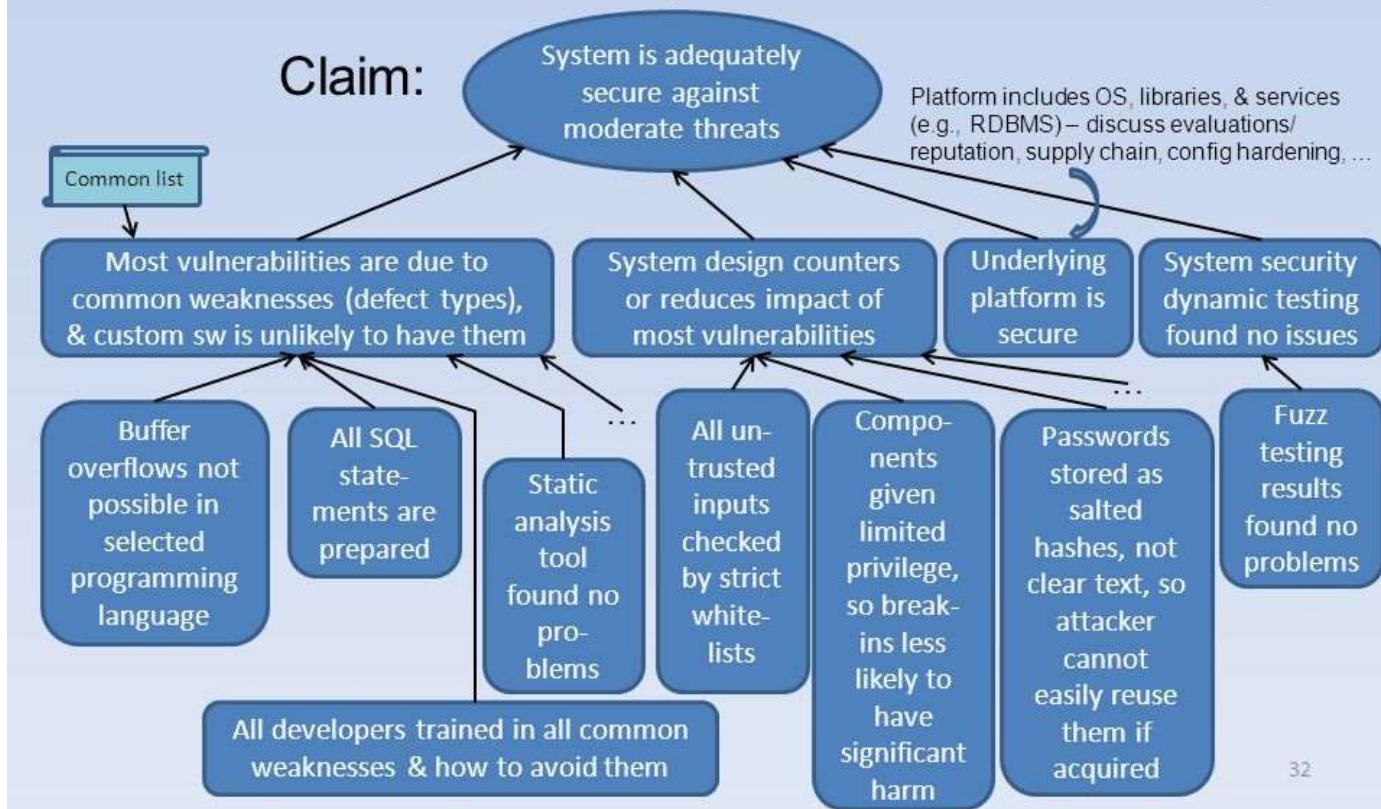- ISO/IEC TR 15443
- ITU-T CYBEX 1500 series
  - CVE / NVD
  - CWE (CWRAF/ CWSS, SANS CWE Top 25 / OWASP Top 10) and CAPEC

- ISO/IEC 27000 series
- ISO/IEC 15408
- ISO/IEC DIS 20243 /O-TTPS
- FISMA
- HIPAA
- IEC 62443
- DTSec

- IEC 80001
- AAMI TIR 57
- PCI
- SANS 20 CSC
- Cyber Essentials (UK)
- US FDA Pre- and Post- Market Guidance
- UL 2900

- Top 35 mitigation strategies (AU)
- NIST Cybersecurity Framework & SP 800-53r4 security controls
- DHS C^3 VP & CRR
- SAE AS5553 & 6174

Example – UL 2900
criteria for a baseline of cybersecurity hygiene focused on repeatable reproducible testing

UL 2900

Fuzz Testing

Known Vulnerability

Code & Binary Analysis

Access Control & Authentication

Cryptography

Remote Communication

Software Updates

Risk Assessment

Structured Pen Testing

Fuzz Testing

A technique used to discover coding errors and security loopholes in software, operating systems, or networks by inputting massive amounts of random data, called fuzz, in an attempt to make the device operate improperly.

UL 2900

Fuzz Testing

Known Vulnerability

Code & Binary Analysis

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Known Vulnerability

A known vulnerability if a vulnerability listed in the National Vulnerability Database (NVD).
https://nvd.nist.gov

- Provides an ability to identify the software supply chain

SOFTWARE BILL OF MATERIALS

Source of the software:
- In-house development
- Third-party library
- Open source
- Snippets of open source

Fuzz Testing

Known Vulnerability

Code & Binary Analysis

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Static Analysis

A process in which source code, bytecode or binary code is analyzed without executing the code.

Analysis of:
- Source code
- Binary code
- Bytecode

UL 2900

Fuzz Testing

Known Vulnerability

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Structured Pen Testing

FOUNDATIONAL SECURITY REQUIREMENTS FOR ANY PRODUCT

Testing Access Controls
- Recording Communication Logs
- Testing Logging Capabilities
- Verifying Products are setup for the controls listed

Cryptographic Controls
Verifying Cryptographic Controls Being Used

Remote Communication
Data communicated over any remote interface

Software Updates
Update software versions

UL 2900

Fuzz Testing

Known Vulnerability

Code & Binary Analysis

Access Control & Authentication

Cryptography

Remote Communication

Software Updates

Risk Assessment

Structured Pen Testing

- Product management relates to the ability to perform an update of the software

- Requirements include:
  - Software update authenticity
  - Software update authorization
  - Software roll-back
  - Security logging
  - Management of configuration data (Zeroization)

UL 2900

Fuzz Testing

Known Vulnerability

Code & Binary Analysis

Access Control & Authentication

Cryptography

Remote Communication

Software Updates

Risk Assessment

Structured Pen Testing

Structured Penetration Testing

A software attack on a computer system that looks for security weaknesses, potentially gaining access to the computer's features and data. The process typically identifies the target systems and a particular goal, then reviews available information and undertakes various means to attain the goal.

NOTE:
Penetration test will always be customized and structured to the specific product being tested as it is dependent on all the previous testing (CWE's and CVEs) and the risk assessment.

Cybersecurity baseline for healthcare

Uses Existing Risk Management Processes
- ISO 14971 Product-centric risk management
- IEC 80001 Network-centric risk management

Uses Existing QMS
- ISO 13485 Quality management
- ISO 27000 Security management

Uses Existing SDLC
- IEC 62304 Medical device life cycle processes
- ISO 15408 Secure development lifecycle processes

Aligned With Regulatory Processes
- FDA Pre- and Post-Market Guidance
- ISO 15026 Assurance Case Structure

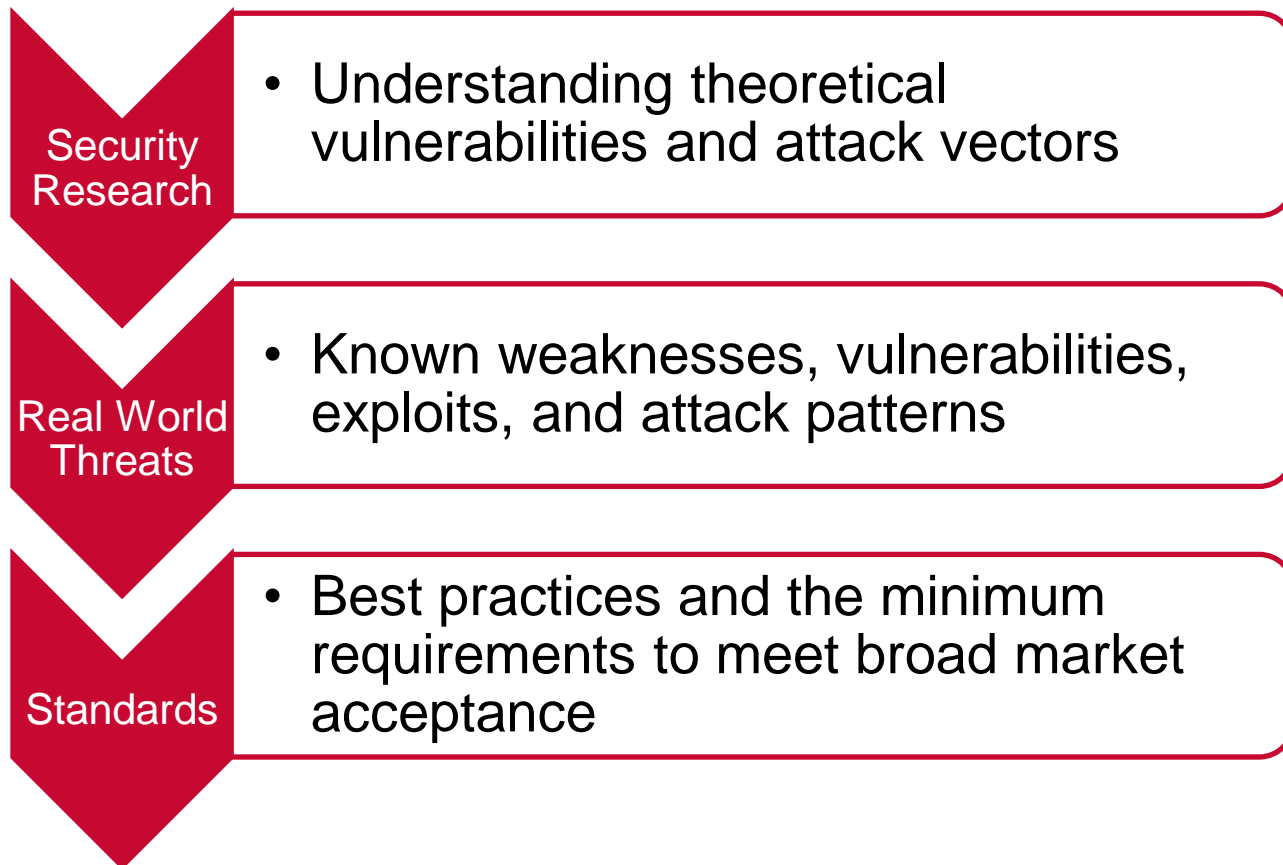CAP tools help establish BOM showing software components from libraries and SOUP

Manage patches

NIST CSF NVD CVSS, CWSS, CAPEC, etc

Intended to help with hospital procurement processes to:
- reduce vulnerabilities
- reduce malware
- increase security awareness and preparedness

Building expectations in the market that all connectable products meet a minimum level of "hygiene" that continues to evolve as the threat landscape changes.

Security Research
- Understanding theoretical vulnerabilities and attack vectors

Real World Threats
- Known weaknesses, vulnerabilities, exploits, and attack patterns

Standards
- Best practices and the minimum requirements to meet broad market acceptance

Thank you